139040

U.S. Environmental Protection Agency
Region III
Wheeling Field Section
303 Methodist Bldg., 11th & Chapline Sts.
Wheeling, WV. 26003

DATE: October 2, 1984

SUBJECT: RCRA Inspections - Fike Chemical, Incorporated (WVD047989207) and CST Incorporated (WVD030143960)

FROM: James L. Bailey, Environmental Scientist JLB
Wheeling Field Section (3ES13)

TO: Peter Schaul, Chief
RCRA Enforcement Section

THRU: Scott McPhilliamy, Environmental Scientist
Wheeling Field Section (3ES13)

I. Date of Inspection: August 21, 1984

II. Facilities: Fike Chemical, Inc. and CST-Incorporated
P.O. Box 546 Same Address
Nitro, WV. 25143

III. EPA Personnel: James L. Bailey, Wheeling EPA Office
Bruce Potoka, Hazardous Waste Management Division — Philadelphia EPA Office

IV. Facility Personnel: Harry Miller - Safety and Regulatory Affairs

V. Background Information: On August 24, 1984, Fike Chemical and CST, were inspected by EPA representatives from the Wheeling Field Office and the Regional Office. The purpose of this visit was to conduct a RCRA CEI inspection at both facilities. The RCRA inspection also included a follow-up to a recently issued EPA compliance order which had listed deficiencies noted during an earlier RCRA inspection.

In addition, it had only recently come to the attention of the WFO, that a Consent Decree (Civil Action 80-2497) had been filed against Fike Chemical. Consequently, it was initially decided that the inspection should include a determination of compliance with this Consent Decree.

During the initial on-site meeting between EPA and Harry Miller, the purpose and scope of the inspection were explained to Miller. With regard to the Consent Decree, Miller stated that all information/actions required by the Consent Decree were forwarded to the EPA Regional Office. This information, in the form of monthly progress reports was reportedly forwarded to Bruce Byrd, Assistant Reginal Council for EPA Region III. Since the EPA inspectors did not have copies of these monthly progress reports, or were even aware they existed, there was no basis for comparison regarding Fike Chemical compliance with the Consent Decree. For this reason, other than for general discussion purposes, compliance with the Consent Decree was not a major point of address during the inspection.

2 ✓

VI. Deficiencies Noted in Previous Inspection

The initial items of discussion during the August 21, 1984, inspection were a number of specific RCRA violations found by EPA on February 23rd, March 22-23rd, 1984. These problems and the status of the corrective actions are discussed below.

1. Fike Chemical was storing drums containing waste creosote (U051) and waste napthalene (U165) on their property. The creosote and napthalene drums were the property of Maine Coastal. Since the dates of these initial inspections, the creosote and napthalene have been returned to Maine Coastal.

2. Fike Chemical was storing drums containing hazardous waste outside of the designated hazardous waste storage area. Efforts have been made to move every drum containing hazardous waste or unknowns to the designated drum storage area. During the inspection on 8/21/84, several drums were noted in other than the designated storage area, however, these were explained as containing usable product.

3. Hazardous wastes were stored in drums which were leaking or not in good condition. This violation has not been satisfactorily corrected. No actual leaking drums were observed, however, numerous rusty drums were noted. One drum had collapsed and its liquid content was contained only by the plastic lining. One drum appeared to be bulging, and some past spillage was still visible within the storage area. There were two full rows of drums stacked two high and two partial rows. One top drum containing dilute acetic acid appeared ready to fall.

4. Fike Chemical did not have written operating records containing the required administrative information pertaining to RCRA. Record keeping has improved since Fike's receipt of the Compliance Order. The one area still deficient are RCRA employee training records. Such records are not available for the Fike facility.

5. Fike Chemical failed to include all required information in its Biennial Report filed February 29, 1984. Harry Miller said that the attorney representing Fike Chemical had submitted a response to EPA and requested a hearing.

6. Fike Chemical in response to NOV III-82-17-VR, September 28, 1982, failed to submit a Certificate of Liability Insurance with wording required by 40 CFR 264.151(j). This deficiency can best be corrected by direct communication between Fike Chemical and appropriate personnel in the Regional Office.

VII. RCRA Inspection

On August 21, 1984, RCRA inspections were completed at Fike Chemical, Inc., and CST, Inc., utilizing the following EPA insepction forms. They are included as attachments to this report. Pertinent comments relating to these forms are included below.

Fike Chemical, Inc.

RCRA Checklist for Inspection of Generator
RCRA Checklist for Inspection of TSD Facility
RCRA Checklist for Use and Management of Containers
RCRA Checklist for Surface Impoundment
RCRA Checklist for Tanks

C.S.T. (Co-Operative Sewage Treatment)

RCRA Checklist for Inspection of TSD Facility
RCRA Checklist for Chemical, Physical and Biological Treatment

1. Generator Form - Fike Chemical, Inc.

(A) In addition to the hazardous waste listed on the Part A, the following hazardous waste were found in the oily liquid originating from the ten large tanks holding sludge from Lagoon No. 1. See Section VII-5 for discussion on the origin of this sludge. The priority pollutant samples were collected in February 1984 by EPA. The following two U-series compounds were found in this sample: Phenol 340 mg/l (U188) - Bis (2-ethylhexyl) phthalate 40,000 mg/l (U028).

All leachate and or runoff from the ten open-top large tanks is collected and pumped directly to CST. The two above mentioned chemicals were also found in the sludge from the CST facility.

(B) The manifest system is not used at Fike Chemical because they have stated the facility does not generate hazardous waste.

2. TSD FORM - Fike Chemical

(A) Site security is lax at Fike Chemical because the existing fence is in need of repair at several locations.

(B) A groundwater monitoring system has been installed to satisfy Item-IV E of the Consent Decree entitled Delineation of Contaminant Plume in Groundwater Under the Site. This groundwater assessment plan includes both Fike Chemical and CST.

The monitoring wells in use would intercept the contaminant plume originating from or passing under Fike Chemical. Any contamination originating from CST would not be detected because the in place monitoring wells are upgradient of CST.

Two sets of plume delineating samples have been collected to date. The EPA recommended holding time (prior to laboratory analysis) on the first set was exceeded negating their reliability. In addition, a background (upgradient) sample was not collected. The second set of samples were collected in July 1984 and as reported by Harry Miller, includes a background sample from monitoring well number 10. Although a groundwater monitoring system has not been installed for CST, two wells were located during the inspection. One monitoring well, Number 14B, exists down gradient of CST. This well is located on Allied Chemical Corporation property and was installed during a EPA contrator (J.R.B. Associates) study of Fike Chemical. The second Well 14A is shallow and was installed to intercept a oily substance that may or may not have originated at CST.

(C) RCRA Regulation, 40 CFR 265.90(D), 265.93(d)(3),(4) and (5), stipulate the requirements for the use of an alternate Groundwater Monitoring System. The facilities are utilizing an alternate groundwater monitoring system in lieu of a conventional groundwater monitoring system which apparently was never completed. Additionally, this alternate plan has been referred to as a ground water quality assessment plan.

The Groundwater Quality Assessment Plan for Fike Chemical, Inc., and CST dated January 15, 1983, was submitted (date unknown) to the Regional Administrator.

At that time the plan should have been accepted or rejected until specific changes were made.

Deficiencies noted in the plan during review by the Wheeling Field Office are as follows:

(a) The cover page states "Ground Water Quality Assessment Plan for Fike Chemical, Inc., and CST". Assuming the groundwater flow direction is toward the Kanawha River, the monitoring wells locations (with the exception of No. 14A and B, which are not mentioned in the plan) would intercept contaminants from Fike Chemical, but not from CST; therefore this plan covers Fike Chemical, Inc. (WVD047989207) only. Note, the lagoon listed on CST's Part "A" is actually located on the Fike Site (see Recommendation #1).

(b) In Section II-A of the plan twelve wells are specified. They include GW1 through GW4 (4 nests of 3), and attachment number 3 covers location, construction, etc., and includes a drawing of a typical well nest. The data page submitted by Fike for the first round of samples collected depicts

data from eleven wells numbers 15,16,17,18,19,20,13B,12,GW1B, GW2B and 21. Either we do not have a revised version of the plan or the wells which were sampled do not agree with the Groundwater Quality Assessment Plan submitted by Fike Chemical. Two upgradient wells are specified in the plan only one is identified (Well No. 10) and located on Attachment No.1.

(c) Section II-B, of the plan stipulates initial sampling will be performed by means of a stainless steel bailer. Attachment #3 specifies sampling shall be accomplished by means of a teflon bailer. EPA will accept either bailer if the plan includes one of two things. Either a bailer is dedicated to each well or if a limited number of bailers are available, the upgradient wells are sampled first and an adequate cleaning procedure is included in the plan and used between wells.

Included in Section II-B is a plan to install jet-type lifts where possible. Jet pumps, gas lift techniques, and suction lift methods are generally not acceptable for collection of samples because of the physical changes the samples are subjected to during collection.

Section II-B also states: "At least one (1) volume of standing water will be removed before sampling and the water table elevation at each well will be monitored." The procedure used in monitoring the water table elevation should be described. The point of reference, either top of pipe or ground surface must be stated. The point of reference (known elevation) was determined when the site was surveyed. This measurement must be made prior to evacuating the well.

The amount of water that will be removed during well evacuation should be sufficient to ensure that samples representative of in situ groundwater quality can subsequently be collected. Normally three to five well volumes are recommended.

The groundwater evacuated from each well is contaminated and is considered a RCRA regulated waste and must be treated accordingly. Groundwater evacuated on the two previous sampling dates (January and July 1984) was disposed of via Coastal Tank Lines Waste Water Treatment Plant.
If this is to be the standard procedure used, it also must be included in the Groundwater Quality Assessment Plan.

(d) This Section includes a list of parameters required by the Consent Decree for plume delineation. A copy of the analytical data obtained from the first round of sampling did not include all the required parameters. Missing from the list were tetrachloroethylene, trichloroethylene, cyanide and arsenic.

Delineation of the contaminant plume was originally due by January 14, 1984, (Consent Decree Civil Action No. 80-2497). This due date was extended to February 29, 1984. This inspection was conducted August 21, 1984, and the analytical results were still not available.

The RCRA requirements for groundwater monitoring have not been met at Fike Chemical or CST. Fike Chemical has upgradient and down gradient monitoring wells, but no acceptable data as of August 21, 1984. CST is not addressed in the Groundwater Quality Assessment Plan. One monitoring well 14B (down gradient) does exist, but has not been sampled. Also, one of the wells at Fike could potentially serve as an upgradient well for CST. To satisfy minimum RCRA requirements, two additional down gradient wells must be installed, assuming the above mentioned wells can be used.

3. RCRA Checklist for Use and Management of Containers

(A) The facility does not have a complete (or near complete) inventory of the drums in the designated drum storage area. Additionally, the contents of the majority of the drums could not be identified due to the absence of labels on the drums. These drums contain chemical constituents purchased by Fike from other chemical produces for use, by Fike, as raw materials in the production of new chemicals. When production at Fike requires the use of components in these drums (usually unlabelled), they are opened and, if acceptable, are utilized in the production run. If the contents of any drum prove unacceptable, the material is sent to CST.

Since the majority of the drums are not identified by label, their contents cannot be compared to Fike's Waste Analysis Plan. This plan lists the wastes received and handled at the facility. When a drum of material is considered unacceptable for a particular Fike process it is sent to CST. There is no way to determine compatability with the CST WWTP or whether this practice can be considered as a legitimate disposal practice under RCRA. It appears that only limited/minimal testing of the drum contents is undertaken by Fike Chemical prior to the decision to send the contents to CST.

(B) Many containers in the drum storage area were in poor condition. Numerous drums were rusty, and one drum had eroded to the point of collapse and only the plastic inner liner prevented spillage of the liquid. One drum appeared to be bulging. Two rows of drums were stacked two high and one of the drums on the top row appeared ready to fall. No drums were leaking, but evidence of recent spills were visible within the containment area.

4. RCRA Checklist Surface Impoundment

(A) Fike Chemical has one surface impoundment with a volume of 25,600 cubic feet and a freeboard of approximately one foot. The impoundment has a clay liner as well as a heavy plastic cover firmly anchored around the parimeter.

Nothing has been added to the lagoon in a year. An analysis of the lagoon contents by Fike's consulting laboratory has provided the following results: Cyanide 30 to 50 ppm, phenol 10 ppm, and sodium chloride 3%.

This is the lagoon intended for pretreatment of non-biodegradable wastes prior to transfer to CST. However, as mentioned above, no waste has been sent to this lagoon for approximately one year.

5. RCRA Checklist for Tanks

During the inspection ten large tanks (20,000 gallons each) were noted adjacent to Fike Lagoon No. 3. These tanks are located within a concrete diked area. Each of these tanks is essentially full and contains sludge material which was excavated from Fike Lagoon No. 1. This lagoon has since been backfilled. The sludge had been removed from Lagoon No. 1 in July 1981 at the order of the West Virginia DNR. The removal of the sludge was necessary in order to prevent a confirmed groundwater problem. Since 1981, the leachate from these open tanks has been diverted to CST. In March 1984, EPA collected a sample of this leachate for priority pollutant analysis. The leachate exhibited a phenol concentration of 340 mg/l and a Bis (2-ethylhexyl), phthalate concentration of 40,000 mg/l. A sample of the CST sludge was also analyzed. See following paragraph for listing of these results.

6. CST (Co-Operative Sewage Treatment)

Facility owner/operator does not consider CST to be a generator of hazardous waste. Waste to be treated is piped from Fike Chemical, Inc., and Maine Coastal. According to Harry Miller an agreeement exists between CST and Maine Coastal. This agreement allows Maine Coastal to send only two waste products to CST. They are: Monsize (from Monsanto) and lesser amounts of Tall oil fatty acid. However, the influent flows from Maine Coastal and Fike are not monitored. (Sampled, analysed and the flow measured). Sludge from CST's drying beds is landfilled at City Disposal Service in Detroit, Michigan.

Priority pollutant analysis of a sludge sample collected from CST in February 1984 by EPA revealed the following RCRA parameters and concentration:

U188	Phenol	9.08 mg/kg
P030	Cyanide	40.0 mg/kg
U028	Bis (2-ethylhexel) phthalate	4400.00 mg/kg

A groundwater monitoring plan has not been implemented and Harry Miller said, "Monitoring wells will be installed when a strategy is developed that will

satisfy EPA. Mr. Fike's hydrogeologist is working with NEIC Denver to resolve the issue".

Another concern at Fike Chemical are the two areas known to contain buried drums. As the drums deteriorate their contents could contribute to the existing groundwater problem.

VIII. RECOMMENDATIONS

1. The lagoon located on Fike Chemical site WVD047989207, but listed on CST's Part A WVD030143960, should be removed from CST's Part A and added to Fike Chemical Part A. All reference to CST for in the Groundwater Quality Assessment Plan for Fike Chemical should be deleted.

2. Evaluate the need for a groundwater monitoring plan at CST which includes proposed monitoring wells and justification for their locations. If possible incorporate monitoring well 14B in the plan if needed and submit this plan to EPA and DNR for review.

3. The practice of sending unacceptable raw material to CST for disposal should be discontinued. These materials are purchased from other chemical companies for feed stock in the production of new chemicals by Fike. These products can include methanol, methylene chloride, toluene, etc., which are hazardous wastes if not legitimately reclaimed or reused. Simply sending the unwanted (off-spec) materials to CST for disposal does not appear to represent an acceptable practice under the requirements of RCRA.

4. The drums in the designated drum storage area which are severly corroded, leaking or bulging should be placed in overpacks or their contents transferred to clean drums suitable for storage.

5. All administrative records (RCRA) pertaining to introductory and continuing training should be brought up-to-date for Fike and CST employees.

6. The leachate from the open-top tanks contianing the contents of Fike Lagoon No. 1, exhibited a phenol concentration of 340 ppm and a Bis (2-ethyl-hexyl) phthalate of 40,000 ppm. These chemicals are hazardous constituents as defined in Appendix VIII of 40 CFR Part 261. Consequently, EPA should determine whether or not the concentrations of the two above listed chemicals are sufficient to list the chemicals as hazardous wastes.

7. The fence enclosing Fike Chemical, Inc., should be repaired.

8. Fike Chemical should submit copies of results of plume delineation samples to DNR and EPA as soon as they are available. These results should have been available in February 1984. In addition, it appears some clarification is necessary to delineate the actual wells which are being utilized for this study.

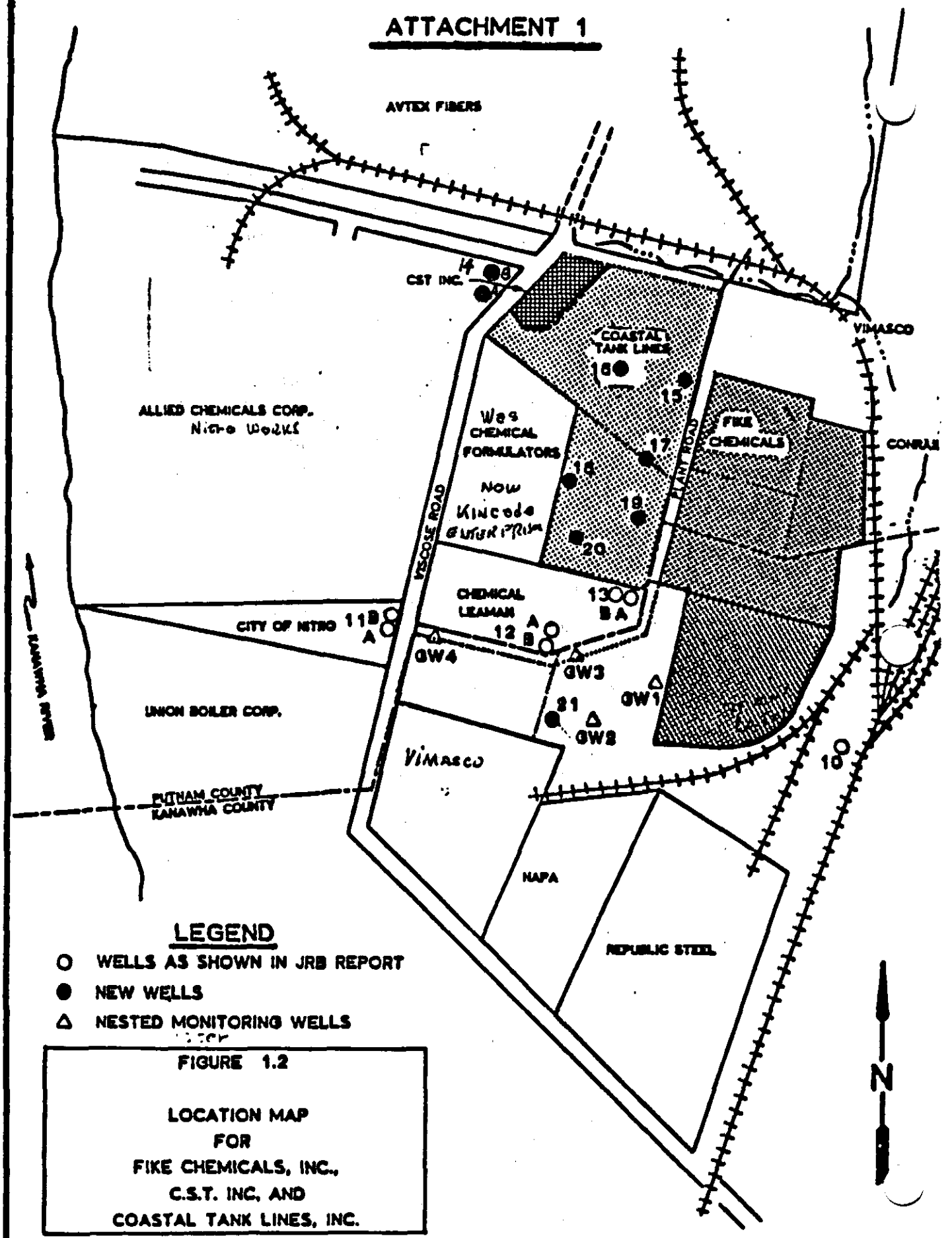
9. The groundwater quality assessment plan for Fike Chemical, Inc. should be updated. The changes/corrections listed in this report should be considered in the update of this plan.

10. It appears there are sufficient wells already on site at Fike Chemical to satisfy the RCRA requirements for groundwater monitoring. The wells necessary for this requirement should be sampled and analyzed for the complete list of RCRA groundwater monitoring parameters. To date, such sampling and analysis has never been conducted. At the present time the only parameters subject to analysis are those parameters specified in the Consent Decree regarding plume delineation. (The complete list of RCRA groundwater parameters have never been included in a sampling and analysis program).

11. EPA/DNR should split monitoring well samples with Fike Chemical during their next scheduled quarterly monitoring period (October 1984). Any additional samples required to clarify unknowns at the facility could also be collected at this time. (The EPA Wheeling Office can provide a listing of such sample points).

Attachments: 1) Location Map-Fike Chemical
2) Fike Chemical On-Site Sampling Results
3) RCRA Checklist for Inspection of Generator
4) RCRA Checklist for Inspectin of TSD Facility
5) RCRA Checklist for Use and Management of Containers
6) RCRA Checklist for Surface Impoundment
7) RCRA Checklist for Tanks

ATTACHMENT 1



LEGEND

- ○ WELLS AS SHOWN IN JRB REPORT
- ● NEW WELLS
- △ NESTED MONITORING WELLS

FIGURE 1.2

LOCATION MAP
FOR
FIKE CHEMICALS, INC.,
C.S.T. INC, AND
COASTAL TANK LINES, INC.

SCALE: 1" = 400'

Attachment N

...E CHEMICAL ON-SITE SAMPLING RESULTS

Sta #	Sample Location Description	RCRA Test Only	Arsenic	Cadmium	Chromium (Total)	Lead	Mercury	Phenols	Cyanide	Bis (2-ethylhexyl) Phthalate	Benzylbutyl Phthalate	Diethyl Phthalate	Toluene	Di-n-butyl Phthalate	Phenathrene	Pyrene	Units (Concentration)
00	Blank		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	TR	ND	ND	ND	mg/l
10	Drying Bed Sludge		96.7	3.3	27,900	526	9.4	9.08	40	4400	200						mg/kg
11	Marine Coastal - Wash Water Discharge		<- - - - - - -ANALYZED FOR VOA's ONLY — NONE DETECTED- - - - - - - - - - - - - - - - ->														
12	Plugged Manhole adj. to drum steam cleaning area		0.035	ND	0.15	0.37	.0012	0.86	.17	ND	ND	0.85	ND	ND	ND	ND	mg/l
13	Runoff fr. drum steam cleaning operation		0.7	0.4	10.6	5.7	ND	21.4	5.1	ND	ND	ND	20	ND	ND	ND	mg/l
14	(Hand-dug) collection sump for drum wash runoff		0.1	ND	ND	ND	ND	0.62	.13	ND	ND	ND	ND	ND	ND	ND	mg/l
15	Oily liquid inside concrete dike area		-	-	-	-	-	340	-	40,000	2,300	ND	ND	710	710	390	mg/l
01	Drum (Area A)	x	CORROSIVE: OXIDIZER														N/A
02	Drum (Area B)	x	CORROSIVE: REACTIVE: IGNITABLE (30° C)														N/A
03	Drum (Area A)	x	OXIDIZER														N/A
04	Drum (Area A)	x	CORROSIVE: OXIDIZER														N/A
05	Drum labeled "Trichlorobenzene", loc. behind drum wash area	x	OXIDIZER														N/A
06	Drum labeled "Airfoam B", loc. next to #5	x	OXIDIZER														N/A
07	Drum behind drum wash area, near drums marked "Oleum"	x	CORROSIVE														N/A
08	Drum (Area C)	x	IGNITABLE (FLASH POINT 42°C)														N/A
09	Drum with red, white & blue (with stars) markings, loc. approx. 30 ft. from sodium bunkers	x	OXIDIZER: REACTIVE														N/A

EPA CHECKLIST FOR INSPECTION OF GENERATORS

RO USE

Name of Facility: FIKE Chemicals, INC

Inspection file

Address: P.O. Box 546

No.

Nitro, W.V. 25143

19th St. West Nitro

Reviewer

EPA Generator ID Number: WVD047989207

Date Reviewed:

Facility Inspection Representative: Harry H. Miller III

Form "A"

Title: Safety & Regulatory Affairs

Telephone Number: 304-755-3336

Pert. Regs.
40 C.F.R.

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Custom Synthesis of Organic Chemicals

2. Does the generator disposes of its wastes....

A. On-site

(Circle one)

(B) Off-Site

direct pipeline to CST

Note: If on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

AR101079

3. Are 1000 kg (2200 Lbs) or more of hazardous waste produced by the generator facility in a month?(If the amount is less than 1,000 kg/month, then the facility qualifies as a small generator and Form C should be completed instead of Form A.) (Yes) No

4. What categories of hazardous wastes result from the generator's facility?

A. Ignitable wastes (Yes) No

B. Reactive wastes INTERMITTENT (Yes) No

C. Corrosive wastes (Yes) No

D. EP Toxic wastes NO KNOWN E.P. TOXIC but all wastes have NOT been tested Yes (NO)

E. RCRA Listed Wastes (Yes) No

Types See Part "A" _____ _____

_____ _____ _____

_____ _____ _____

5. Is the generator presently...

A. Treating hazardous waste? FIKE NO - CST - yes Yes (No)

B. Storing hazardous wastes longer than 90 days? (Yes) No

C. Disposing hazardous waste? Yes (No)

Note: If the generator performs any of the activities noted in Question 5, then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

262.20 6. In a manifest system currently in operation at the generator's facility so that offsite shipment of hazardous wastes can be tracked? Yes (No)
Copies Available & would be used if required
waste piped directly to CST.

7. Please inspect the generator's manifest for the following information — Not used to date. All waste piped to CST.

262.20	A.	Is the TSD facility which receives a generator's hazardous waste identified by name, address, and EPA ID number?	Yes No
262.20	B.	Is an alternative facility designated in case of an emergency? (Optional)	Yes No
	C.	Is a serialized manifest document number included on the form?	Yes No
262.21	D.	Is the generator's name, address, telephone number and EPA ID number included on the form?	Yes No
	E.	Is the name and identification number of each transporter included on the form?	Yes No
	F.	Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?	Yes No
	G.	Is the quantify of each waste by units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form?	Yes No
	H.	Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature. "This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA."	Yes No
262.22	I.	Are there adequate copies of the manifest available for generator, transporter, and TSD's?	Yes No

262.34(a)(1)	8.	Is all hazardous waste being shipped off-site by the generator within 90 days to a designated facility or placed in an on-site facility either of which has interim status or a Federal hazardous waste treatment, storage or disposal permit?	Yes No Piped directly to CCT
262.34(a)(3)		A. Is the date accumulation of waste began clearly marked on each container?	Yes No N/A. designated storage facility with interim status.
262.34(a)(2)		B. Are storage containers or tanks in good condition, i.e., no corrosion, leaking or structural deformations?	Yes (No) drum storage only No leaks observed but some drums are corroded & contents of one drum is held by inner liner only
		C. Starting at the time of initial accumulation are the storage containers	
262.34(a)(4)		1) Labeled	Yes (No)
262.34(a)(4)		2) Marked	Yes (No)
262.34(a)(2)		3) Packaged	Yes (No)
		as containing a particular hazardous waste in accordance with DOT regulations?	

Questions 9-15 apply to generators who accumulate wastes in a non-permitted facility.

265.16(a)	9.	Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	(Yes) No
265.16(d)	10.	Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	(Yes) No
265.16(d)(2)	11.	Does the generator facility have on record a written position description for each job title noted in Question #10?	(Yes) No
265.16(d)(3)	12.	Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #10?	Yes (No) Miller said he was working on training Records

265.32(a) 13. Does the generator facility have installed the following equipment:

A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? (Yes) No — Telephone + PA system

B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? (Yes) No — Telephone

C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals? (Yes) No

265.35 14. Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes No — Not in the design drum areas are however there were only a full [illegible] of drums on 8-21-84

265.50 15. Does the facility have a contingency plan which contains the following elements:

A. Detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wates to air, soil, and water? (Yes) No

265.52(c) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? (Yes) No — According to Mr. [illegible] all local agencies have copies of plan.

Also Member Kanawha Valley Industrial Emergency Planning Council

265.52(d) C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? (Yes) No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e) D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? (Yes) No — including SCBA & Scotty Shaver

265.53 16. Has a copy of the contingency Plan been submitted to local police, fire departments, hospitals, and emergency response teams that may be called on to provide emergency services. (Yes) No

17. Please provide detailed explanation or comments on specific questions or problems encountered during the inspection. For instance, industry requests for exclusions from optional portions of the regulation or for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: James L. Bailey

Title: Environmental Scientist

Agency: U.S. E.P.A.

Office location: Wheeling, W.V.

Date of Inspection: Aug 21, 1989

Inspector's Name:

Title

Office Location

Date of Inspection:

Name of Facility: Elke Chemic

Address: P.O. Box 5416

Nitro W.V. 25143
19th St. West Nitro

EPA TSD ID Number: WVD047989207

Facility Inspection Representative: Harry K. Miller III

Title: Safety & Regulatory Affairs

Telephone: 304-755-3336

RO USE

Inspection File No. _____

Reviewer _____

Date reviewed _____

Form "B"

SITE CHARACTERIZATION (Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

TREATER	STORER	DISPOSER
___Filtration	___Open Pile	___Landfill operated
___Incineration	+Surface Impoundment	___Land treatment
___Thermal Reduction	✓Drum	___Surface Impoundment
___Recycling/Recovery	+Above ground tank(s)	___
___Chem/Phys/Bio Treatments	___Below ground tank(s)	___Other
___Waste Oil	___Other	
___Reprocessing		
___Solvent Recovery		
___Other		

+-Not Confirmed RCRA facilities

INSPECTION PROCEDURE

1. Does the facility generate hazardous waste? (Yes) N

Note: Please complete the generators checklist, Numbers 1 thru 8, if the TSD facility generates hazardous wastes which are disposed off-site.

265.13 2. Does the on-site or off-site facility have a written waste analysis plan? Copy attached. (Yes) N

263.14 3. Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? Yes (N)
However, Company Personnel: on duty 24hrs/day, 5 days/week, Weekends on Weekends

A. Does the facility have an artificial or natural boundary which surrounds active portions of the facility and, facility is fenced but fence is in need of repair. 24hrs/day Yes

B. Does the facility have means to control entry at all times, i.e., gates, attendants, locked entrances, etc.? Locked Gates yes but fence in need of repair. Yes N

265.14 4. Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? An example would be: "Danger-Unauthorized Personnel Keep Out!" (Yes) N

Several Signs Posted at Various Intervals
"Danger
NO

AR101085

265.15 5. Does the TSD facility have a written schedule for inspecting all emergency equipment and monitoring equipment, security devices, and operating and structural equipment. (Yes)

265.16(a) 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? yes according to miller, however records are not up to date — Yes

265.16(d) 7. Does the TSD facility maintain a record of job titles for all personnel that are involved with the handling of hazardous waste and the name of the employee filling each job? (Yes)

265.16(d) 8. Does the TSD facility have on record a written position description for each job title noted in Question #7? (Yes)

265.16(d) 9. Does the facility maintain a written description for the type and amount of introductory and continuing training for those employees noted in Question #7? Training Given, according to H. Miller but records not maintained — Yes

265.32 10. Does the TSD facility have installed the following equipment:

A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Telephone & P.A. System. (Yes)

B. A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.? Telephone (Yes)

C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals? (Yes)

265.35 11. Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes N
only 2 full rows of drums, no space between rows.

265.52(a) 12. Does the facility have a contingency plan which contains the following elements: (Yes) N

A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? (Yes) N

265.32(c) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? (Yes) N According to Miller local departments have copy

265.52(d) C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators? (Yes) Nc
Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e) D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility? (Yes) Nc Included SCBA & Safety Shower

AR101086

265.55	13. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures?	Yes
	14. Does the on-site or off-site facility have a written operating record which contains the following information:	
265.73(b)(1)	A. A description and the quantity of each hazardous waste received/managed at the on-site or off-site treatment, storage or disposal facility.	Yes
265.73(b)(2)	B. The location of each hazardous waste managed at the on-site or off-site facility. All Hazwaste & unknown are in the drum Storage area Number of drums have been reduced considerably since Feb 1984 inspection.	Yes
265.73(b)(3)	D. Copies of facility specific waste analysis as required by 88 265.193,265.225,265.252,265.273,265.345,265.375 and 265.402.	Yes
265.73(b)(3)& 265.13	C. Written results of all chemical/Physical analyses of each waste treated, stored or disposed of at the facility. According to M. Milley, yes. He is to send a letter including the list to this office	Yes
265.73(b)(4)	E. Summary reports of incidents requiring implementation of the contingency plan. Not implemented to date.	Yes
265.73(b)(5)& 265.15(d)	F. Records and results of all inspections (see #5) in an inspection log or summary.	Yes
265.73(b)(6)	G. Results from groundwater monitoring (For surface impoundments, land treatment or land disposal facilities) first Set of Samples exceeded EPA Recommended Holding Time. Results from 2nd Set not available yet.	Yes
265.73(b)(7)	H. Closure cost estimate.	Yes
	I. Post Closure cost estimate (land disposal facilities only) Fike does not anticipate any post closure costs.	Yes
265.110	15. Has the TSD facility operator completed a written closure or post closure plan in order to meet the May 1981 date for implemntation of these requirements?	
	Does the TSD facility have:	
	A. Written Closure Plan	Yes
	B. Written Post Closure Plan (land disposal Facility only) N/A	Yes
	16. Does the TSD facility receive waste from off-site generators? Some Spent products: methanol, methylene chloride, toluene. Not considered discarded.	Yes
	If yes, does the operator implement the following procedures: Written Procedure in Waste Analysis to verify each specific product.	
265.13(a)(4)	A. Inspect or analyze incoming wastes and compare with manifest for each shipment received at the facility.	Yes
265.13(b)	B. Specify procedures in the waste analysis plan to carry out #16A.	Yes
265.71	C. Sign and date all manifest copies?	Yes
265.71	D. Return copies of the manifest to the generator and transporter?	Yes
265.71	E. Retain copies of all manifests at the facility for three years?	Yes

Questions 17-22 apply to surface impoundments, land treatment and land disposal facilities.

	17.	Has the operator installed a groundwater monitoring system which consists of:	Yes
.91	A.	At least one well hydraulically upgradient at the limit of waste management area? Installed under J.R.B. Associates Contract.	(Yes)
	B.	At least 3 wells hydraulically downgradient at the limit of the waste management area? Flow direction has not been Verified, monitoring core of Company data.	(Yes)
265.91(c)	18.	Are all monitoring wells cased in a manner to prevent contamination of samples and groundwater? According to info in G.W. Quality Assessment plan they are.	(Yes)
265.90(a)	19.	Do wells monitor groundwater in the uppermost aquifer underlying the facility? Indeterminate info in G.W. Quality Assessment plan to verify	N/D Yes
265.92(a)	20.	Has the operator developed and followed groundwater sampling and analysis plan? They have not Ground Water Quality Assessment Plan	Yes
	21.	Does the plan include methods for establishing concentrations of parameters characterizing...	Yes
	A.	Groundwater Suitability (265.92(b)(1)	Yes
	B.	Groundwater quality (265.92(b)(2)	Yes
	C.	Groundwater contamination (265.92(b)(3)).	Yes
	22.	Has the groundwater monitoring program been implemented by a qualified geologist or geotechnical engineer? Not Verified	N/D Yes
	23.	The inspector should check for the following conditions at the TSD facility:	
	A.	Open fires	Yes
	B.	Fumes or gases	(Yes)
	C.	Leaks or corrosion in containers or other storage structures Corroded or Rusty drums yes - No leaks observed	Yes
	D.	Leachate to receiving streams - None Observed.	Yes
	E.	Malfunction of equipment	Yes
	F.	Bulging drums | drum Appeared to be bulging	(Yes)
	G.	Excessive heat generation from storage facilities, lagoons, storage piles, etc.	Yes
	24.	Please provide detailed comments and explanations on specific checklist items or problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.	

Inspector's Name: James L. Bailey

Title: Environmental Scientist

Agency: U.S. E.P.A.

Office Location: Wheeling, W.V. 26003

Date of Inspection: Aug 21, 1984

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA Checklist for Use and Management of Containers

(Subpart I Section 265.170 - "General Operating Requirements"

R.O. USE

Inspection file No.

Name of Facility: Fike Chemicals INC

Address: P.O. Box 546

Nitro, W.V. 25143

19th St. West. Nitro.

Reviewer:

EPA Generator ID Number: WVD047989207

Date Reviewed:

Facility Inspection Representative: Harry K. Miller

Title: Safety & Regulatory Affairs

Form "I"

Telephone Number: 304-755-3336

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 265.1 provides otherwise.

Pert. Regs. 40 C.F.R. Parts:	Facility does not have inventory, all drums removed from storage area are identified as they are removed.		
265.171	1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? Some Rusty, contents of one drum held by plastic liner loosely	Yes	(No)
265.171	2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? Apparently so by visual confirmed, several drums were leaky	(Yes)	No
265.173(a)	3. Are all containers holding hazardous waste kept closed during storage? Several open drums contained oil clean-up material from recent spill.	(Yes)	No
265.174	4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?	(Yes)	No
265.15(d) 265.15(b)	5. Is an inspection log maintained? Maintained in operating manual/ Contingency.	(Yes)	No
265.176	6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?	(Yes)	No
265.177(a)	7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)	Yes	(No)
265.177(c)	8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? No known incompatible waste.	Yes	No N/I

AR101090

Form "I"

Inspector's Name: James L. Bailey

Title: Environmental Scientist

Agency: U.S.E.P.A.

Office location: Wheeling, W.V.

Date of Inspection: Aug 21, 1984

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA Checklist or Surface Impoundments

(Subpart K Section 265.222 "General Operating Requirements"

R.O. USE

Inspection file No:

Reviewer:

Date Reviewed:

Form "K"

Name of Facility: Fike Chemicals INC

Address: P.O. Box 5H6

Nitro W.V 25143

10th St. West.

EPA Generator ID Number: WVD 047 989 207

Facility Inspection Representative: Harry K. Miller

Title: Safety & Regulatory Affairs

Telephone Number: 304-755-3376

The questions contained in this checklist apply to owners and operators of facilities that use surface impoundments to treat, store, or dispose of hazardous waste, except as Part 265.1 provides otherwise.

Pert. Regs. 40 C.F.R. Part:			
	Impoundment - 1 Cyanide - 30 to 60 ppm Dimensions - 80'x80'x4' phenol 10 ppm Volumn 25,600 Ft³ N-Cl - 2% Covered - heavy plastic tarp. firmely anchored 360°, clay liner		
265.222	1. Is 2 ft. of freeboard maintained in the surface impoundment? 1.0 Ft. Freeboard - Covered, precipitation will not increase volumn	Yes	(No)
265.223	2. Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? except for ramp which constitutes app. 1/3 of one end.	(Yes)	No
265.225(a) (1) & (2)	3. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? this was done initially, Nothing added in over one year according to Miller.	(Yes)	No
265.226(a) (1)	4. Is the freeboard level inspected at least once each operating day?	(Yes)	No
265.226(a) (2)	5. Is the surface impoundment, including dikes and vegetation, inspected once per week to detect leaks or deterioration or failures in the impoundment?	(Yes)	No
	6. Are the results of these inspections recorded in an inspection log or summary?	(Yes)	No
265.229(a)	7. Are ignitable or reactive wastes stored in a surface impoundment: If so,	Yes	(No)
265.229(a) (1)	a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under parts 261.21 or 261.23 of the RCRA regulations? N/A	Yes	No

§5.230	b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided?	N/A Yes No

Inspector's Name: James L. Bailey

Title: Environmental Scientist

Agency: U.S. E.P.A.

Office location: Wheeling, W.V.

Date of Inspection: Aug 21, 1984

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

Name of Facility. IST - (Co-operative Sewage Treatment)

Address: P.O. Box 546

Nitro, W.V. 25143

West 10th. St. Nitro

EPA TSD ID Number: WVD030143960

Facility Inspection Representative: Harry K. Miller

Title: Safety & Regulatory Affairs

Telephone: 304-755-3316

Inspection File No. _____

Reviewer _____

Date reviewed _____

Form "B"

SITE CHARACTERIZATION (Please denote if the facility presently treats, stores or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

TREATER	STORER	DISPOSER
___Filtration	___Open Pile	___Landfill operati
___Incineration	___Surface Impoundment	___Land treatment
___Thermal Reduction	___Drum	___Surface Impoundm
___Recycling/Recovery	___Above ground tank(s)	___
✓ Chem/Phys/Bio Treatments	___Below ground tank(s)	___Other_____
___Waste Oil	___Other_____	_____
___Reprocessing	_____	_____
___Solvent Recovery	_____	_____
___Other _____		
_____		
_____		

INSPECTION PROCEDURE

1. Does the facility generate hazardous waste? Yes (

Note: Please complete the generators checklist, Numbers 1 thru 8, if the TSD facility generates hazardous wastes which are disposed off-site.

265.13 2. Does the on-site or off-site facility have a written waste analysis plan? OFF Site, Fike Chemical INC. (Yes)
2 Specific Wastes from Maine Coastal

265.14 3. Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? Yes (

If Not

A. Does the facility have an artificial or natural boundary which surrounds active portions of the facility and, (Yes)
Fence that encloses Coastal tank lines - No Gate Guard, Gate open.

B. Does the facility have means to control entry at all times, i.e., gates, attendants, locked entrances, etc.? Yes
Could be done but is Not S.O.P.

265.14 4. Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? An example would be: "Danger-Unauthorized Personnel Keep Out!" Yes

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265.15	5. Does the TSD facility have a written schedule for inspecting all emergency equipment and monitoring equipment, security devices, and operating and structural equipment.	(Yes)	
265.16(a)	6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	(Yes)	
265.16(d)	7. Does the TSD facility maintain a record of job titles for all personnel that are involved with the handling of hazardous waste and the name of the employee filling each job?	(Yes)	
265.16(d)	8. Does the TSD facility have on record a written position description for each job title noted in Question #7?	(Yes)	
265.16(d)	9. Does the facility mantain a written description for the type and amount of introductory and continuing training for those employees noted in Question #7? H. Miller stated that he was bringing the records up to doc.	Yes	(
265.32	10. Does the TSD facility have installed the following equipment:		
	A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?	(Yes)	
	B. A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.?	(Yes)	
	C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals?	(Yes)	
265.35	11. Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?	Yes	N/A No
265.52(a)	12. Does the facility have a contingency plan which contains the following elements:	Yes	No
	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? Refer to Fire Chemical TSD Form	(Yes)	No
265.52(c)	B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? Refer to Fire Chemical TSD Form	(Yes)	No
265.52(d)	C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators? Note: <u>This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis</u>.	(Yes)	No
265.52(e)	D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility? Refer to Fire Chemical TSD Form	(Yes)	No

265.55 13. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures? **(Yes)** (circled)

14. Does the on-site or off-site facility have a written operating record which contains the following information:

265.73(b)(1) A. A description and the quantity of each hazardous waste received/managed at the on-site or off-site treatment, storage or disposal facility. *Waste from Fike (str plant) Two particular waste products piped in from Maine Coastal - this would be difficult to vol.* Yes

265.73(b)(2) B. The location of each hazardous waste managed at the on-site or off-site facility. *Treatment only, all waste is piped to plant.* Yes N

265.73(b)(3) D. Copies of facility specific waste analysis as required by §§ 265.193,265.225,265.252,265.273,265.345,265.375 and 265.402. Yes N

265.73(b)(3)& 265.13 C. Written results of all chemical/Physical analyses of each waste treated, stored or disposed of at the facility. *See Fike Report* Yes

265.73(b)(4) E. Summary reports of incidents requiring implementation of the contingency plan. *Not applicable to date* Yes

265.73(b)(5)& 265.15(d) .F. Records and results of all inspections (see #5) in an inspection log or summary. **(Yes)** (circled) N

265.73(b)(6) G. Results from groundwater monitoring (For surface impoundments, land treatment or land disposal facilities). *Results Not available as of inspection date* Yes (N) (circled)

265.73(b)(7) H. Closure cost estimate. **(Yes)** (circled) N

I. Post Closure cost estimate (land disposal facilities only) *don't anticipate any post closure costs.* Yes **(No)** (circled)

265.110 15. Has the TSD facility operator completed a written closure or post closure plan in order to meet the May 1981 date for implemntation of these requirements?

Does the TSD facility have:

A. Written Closure Plan **(Yes)** (circled) No

B. Written Post Closure Plan (land disposal Facility only) Yes **(No)** (circled)

16. Does the TSD facility receive waste from off-site generators? *Fike & Maine Coastal - both piped directly to W.W.T.P.* **(Yes)** (circled) No

If yes, does the operator implement the following procedures: *No Manifest used*

265.13(a)(4) A. Inspect or analyze incoming wastes and compare with manifest for each shipment received at the facility. Yes **(No)** (circled)

265.13(b) B. Specify procedures in the waste analysis plan to carry out #16A. *All waste identification handled by Fike.* Yes No

265.71 C. Sign and date all manifest copies? *No manifests used* Yes No

265.71 D. Return copies of the manifest to the generator and transporter? Yes No

265.71 E. Retain copies of all manifests at the facility for three years? Yes No

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Questions 17-22 apply to surface impoundments, land treatment and land disposal facilities.

	17.	Has the operator installed a groundwater monitoring system which consists of: Additional Monitoring wells will be installed when strategy developed that will satisfy EPA. Like a hydrogeologist has worked with NEIC	Yes
265.91	A.	At least one well hydraulically upgradient at the limit of waste management area? Copy of Ground water monitoring plan sent to Region	Yes
	B.	At least 3 wells hydraulically downgradient at the limit of the waste management area? one well No. 14 B could be used located on Allied Chemical property	Yes
265.91(c)	18.	Are all monitoring wells cased in a manner to prevent contamination of samples and groundwater?	Yes
265.90(a)	19.	Do wells monitor groundwater in the uppermost aquifer underlying the facility?	Yes
265.92(a)	20.	Has the operator developed and followed groundwater sampling and analysis plan?	Yes
	21.	Does the plan include methods for establishing concentrations of parameters characterizing...	Yes
	A.	Groundwater Suitability (265.92(b)(1)	Yes
	B.	Groundwater quality (265.92(b)(2)	Yes
	C.	Groundwater contamination (265.92(b)(3)).	Yes
	22.	Has the groundwater monitoring program been implemented by a qualified geologist or geotechnical engineer?	Yes
	23.	The inspector should check for the following conditions at the TSD facility:	
	A.	Open fires	Yes
	B.	Fumes or gases	Yes
	C.	Leaks or corrosion in containers or other storage structures	Yes
	D.	Leachate to receiving streams	Yes
	E.	Malfunction of equipment	Yes
	F.	Bulging drums	Yes
	G.	Excessive heat generation from storage facilities, lagoons, storage piles, etc.	Yes
	24.	Please provide detailed comments and explanations on specific checklist items or problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.	

Inspector's Name: James L. Bailey

Title: Environmental Scientist

Agency: US EPA

Office Location: Wheeling, W.V.

Date of Inspection: Aug 21 1984

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA Checklist for Chemical, Physical and Biological Treatment

(Subpart Q Part 265.40 - "General Operating Requirements"

R.O. USE

Inspection file No:

Reviewer:

Date Reviewed:

Form "Q"

Name of Facility: C.S.T. (Co-operative Sewage Treatment

Address: P.O. Box 546

Nitro W.V. 25143

West 19th Street

EPA Generator ID Number: WVD 030193960

Facility Inspection Representative: Harry K. Miller

Title: Safety & Regulatory Affairs

Telephone Number: 304-755-3336

The questions contained in this checklist apply to owners and operators of facilities which treat hazardous wastes by chemical, physical, or biological methods in other than tanks, surface impoundments and land treatment facilities except as Section 265.1 provides otherwise.

Part. Regs. 40 C.F.R. Part:			
265.401(b)	1. Are all treatment processes or equipment in good condition, i.e., not showing signs of leakage, corrosion or any other deterioration?	(Yes)	No
265.401(c)	2. Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop this inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) Chemical sewers drain to two sumps. Two sys. (1) Shut off sump pump. (2) Close off chemical sewer. (3) divert flows to first Pond.	(Yes)	No
265.402(1) & (2)	3. Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? All waste generated are Compatible according to H. Miller.	Yes	(No)
	4. Is this information recorded in the facility's operating record?	(Yes)	No
265.403(a) (1)	5. Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cut-off systems, drainage systems and pressure relief systems)?	(Yes)	No
265.403(a) (2)	6. Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? plus effluent monitoring: PH, COD, T. Solids, TSS, Contract lab BOD, phenol, TOC, Metals, NH_3-N, SON, R.O. Toxicity	(Yes)	No
265.403(a) (3)	7. Are construction materials of the treatment process or equipment and immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration?	(Yes)	

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	8. Are the results of these inspections recorded in an inspection log or summary?	(Yes)	No
	9. Are ignitable or reactive wastes placed in a treatment process? If so,	Yes	(No)
265.405(a) (1)	A. Are the wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA regulations?	Yes	No
265.405(a) (1)	B. Are the wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?	Yes	No
	10. Are incompatible wastes kept from being placed in the same treatment process or equipment? NO INCOMPATIBLE WASTE According to H. Miller	(Yes)	No

Inspector's Name: James L. Bailey

Title: Environmental Scientist

Agency: U.S.E.P.A.

Office Location: Wheeling, W.V.

Date of Inspection: Aug 21, 1984

Inspector's Name: _____

Title: _____

Agency: _____

Office Location: _____

Date of Inspection: _____

RCR Checklist for Tanks

(Subpart J Section 265.192 - "General Operating Requirements")

R.O. USE

Inspection file No.

Reviewer:

Date Reviewed:

Form "J"

Name of Facility: Fike Chemicals INC

Address: P.O. Box 546

Nitro W.V. 25143

19th St. West

EPA Generator ID Number: WVD047989207

Facility Inspection Representative: Harry K. Miller

Title: Safety & Regulatory Affairs

Telephone Number: 304-755-3336

The questions contained in this checklist apply to owners and operators of facilities that use tanks to treat or store hazardous waste, except as Section 265.1 provides otherwise.

Pert. Regs. 40 C.F.R. Part:			
	10 Large tanks contain contents of Lagoon No. 1 Samples collected by facility personnel indicate material is now Hazardous. Tested for characteristics of Hazardous Waste. Priority Pollutants Samples of Leachate collected by EPA in Feb 1984 Show presence of U028 & U188 See Attached.		
265.17(b)	1. Are all tanks in good condition, i.e., not showing signs of leakage, corrosion, or any other deterioration? Open tanks in containment basin. Leachate collected & pumped to C ST.	Yes (✓)	
265.192(c)	2. Are uncovered tanks operated to ensure a minimum of 2 ft. of freeboard?	Yes	(No)
265.192(c)	3. If not, is the tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank?	(Yes)	No
265.192(d)	4. Are tanks with continuous inflow of hazardous wastes equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? N/A	Yes	No
265.193(a) (1) & (2)	5. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a tank used for storage or treatment? N/A	Yes	No
265.194(a) (1)	6. Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cutoff systems and drainage systems)? drainage system only is Applicable	(Yes)	No
265.194(a) (2)	7. Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? N/A	Yes	No
265.194(a) (3)	8. Is the level of waste in the tank checked at least once each operating day? tanks are filled to capacity, No New material added.	Yes	(No)

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265.194(a)(4)	9. Is (are) the tank (or tanks) inspected weekly to detect corrosion or leaking of fixtures or seams? all leachate collected in containment area.	(Yes)	No
	10. Are the results of these inspections recorded in an inspection log or summary?	Yes	No
265.198	11. Are ignitable or reactive wastes stored in tanks? If so,	Yes	(No)
265.198(a)(1)	a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regs?	Yes	No
265.198(a)(2)	b) Is the waste stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react?	Yes	No
265.198(b)	c) Is the owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code - 1977"?	Yes	No

Inspector's Name : James L. Bailey

Title: Environmental Scientist

Agency: U.S.E.P.A.

Office location: Wheeling, W.V.

Date of Inspection: Aug 21, 1984

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection : _____